



IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA

v.

BRANDON DHANOOLAL,

Defendant

Criminal Action No. 22-43

INFORMATION

The United States Attorney for the District of Delaware charges that:

COUNT ONE

On or about June 30 2020, in the District of Maryland and elsewhere, BRANDON DHANOOLAL, defendant herein, did unlawfully, willfully, and knowingly fail to file with the Commissioner of the IRS a Foreign Bank Account Report for the 2019 calendar year disclosing that he had a financial interest in, and signatory and other authority over bank, securities and other financial accounts in foreign countries which had aggregate values of more than \$10,000.00, specifically, an account at RBC Royal Bank (Trinidad & Tobago) Limited in Trinidad.

In violation of Title 31, United States Code, Sections 5314 and 5322(a) and Title 31, Code of Federal Regulations, Sections 1010.350, 1010.306 and 1010.840.

COUNT TWO

During calendar year 2018, BRANDON DHANOOLAL, defendant herein, a resident of the District of Maryland, had received gross income of \$487,885.00. By reason of such gross income, he was required by law, following the close of the calendar year 2018 and on or before April 15, 2019, to make an income tax return to the Internal Revenue Service Center at Hartford

Connecticut, to a person assigned to receive returns at the local office of the Internal Revenue Service, or to another Internal Revenue Service office permitted by the Commissioner of Internal Revenue, stating specifically the items of his gross income and any deductions and credits to which he was entitled. Well-knowing and believing all of the foregoing, BRANDON DHANOOOLAL did willfully fail, on or about April 15, 2019, in the District of Maryland and elsewhere, to make an income tax return.

In violation of Title 26, United States Code, Section 7203.

DAVID C. WEISS
UNITED STATES ATTORNEY

BY: /s/Lesley F. Wolf
Lesley F. Wolf
Assistant United States Attorney

Dated: July 12, 2022